

Best Management Practices for Used Oil Collection Programs

MRW Coordinator Meeting

May 5, 2015



ESB 6501

- Ecology to develop BMPs for preventing and managing PCB contamination at public used oil collection sites
- Incorporate BMPs into the used oil recycling element of hazardous waste planning guidelines
- A petition process for extraordinary costs

Current Practices

- Conduct a Chlor-d-TECT
- Arrange pump-out with service provider
- Service provider takes samples
- Service provider sends samples to lab when problem is detected in their tanks
- Local governments liable for contaminated oil



Prevent PCBs?

- Many used oil collection sites are DIY – and un-manned
- Can't see PCBs
- Customers may not know about PCBs
- Chlor-d-Tect doesn't read down to 50 ppm



Things You *Can* Do

- Signage
- Educate
- Customer Declaration
- Do not mix with other fuels

**MOTOR OIL
ONLY**

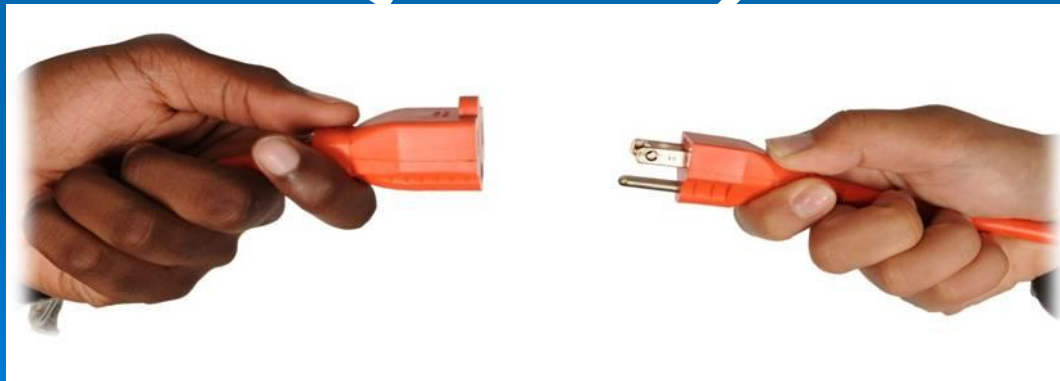
Regulations

- RCW 70.95I – Used Oil Recycling
- RCW 70.105 – Hazardous Waste Management
- WAC 173-350 – Solid Waste Handling Standards
- WAC 173-303 – Dangerous Waste
- 40 CFR Part 279 – Used Oil Management
- 40 CFR Part 761 - PCBs

Disconnect!

40 CFR 279
Used Oil

40 CFR 761
PCBs



Used Oil Specifications

Constituent/Property	Allowable Level
Arsenic	5 ppm
Cadmium	2 ppm
Chromium	10 ppm
Lead	100 ppm maximum
Flash point	100 degrees F minimum
Total Halogens	4,000 ppm maximum
<i>Note: Applicable standards for the burning of used oil containing PCBs are imposed by 40 CFR 761.20(e)</i>	

Toxic Substances Control Act

Part 761 PCBs

Declares that distributing items with PCB concentrations of 50 ppm or greater presents an unreasonable risk of injury to health within the United States.



Starting Point

- Once a facility accepts the oil, the facility becomes the generator
- Cannot introduce PCB-containing items “into commerce”
- Once PCBs greater than 50 ppm are detected – all sorts of requirements kick in

At used oil collection facilities, both 40 CFR 279 and 40 CFR 761 come into play. 40 CFR 761 contains the “distribution in commerce” prohibition. The only way to eliminate your liability is to ensure that the used oil leaving your site does not exceed the 50 ppm limit. The only way to do this is through laboratory testing.

Collecting the Oil - BMPs

- Do not mix anything into the used oil
- Post signs educating customers that **ONLY** used motor oil be put in tanks
- Properly label all tanks. If PCB contamination is discovered, label accordingly

USED OIL

Collecting the Oil - BMPs

- Have an alternative tank or container available to customers while waiting for test results
- Secure used oil tanks and containers when facility is closed



Spill Control - BMPs

- Maintain tanks and containers in good condition and inspect them regularly
- Provide secondary containment
- Follow federal regulations for decontamination methods and standards



Getting Rid of the Oil - BMPs

- If possible, know the fate of the oil leaving your site (i.e. energy recovery, re-refining)
- Know the on-specification/off-specification status of your used oil
- Test the oil in your tank through laboratory analysis, prior to it leaving your site



Testing - BMPs

- Select a qualified lab, accredited by Ecology
- Train staff taking the sample – document
- Direct the lab to use EPA Method 8082A – PCBs by Gas Chromatography
- Keep test results 3 years



Disposal - BMPs

- EPA must be notified of PCB waste handling activity prior to engaging in PCB waste handling activity
- PCB waste must be manifested appropriately
- Used oil with PCB contamination of 50 ppm or higher must go to incinerator, high efficiency boiler, chemical waste landfill, or other authorized destruction method




Ecology Responsibilities – Petition Process

- Ecology, in consultation with city and county MRW coordinators, the EPA, and other stakeholders, must process and prioritize city and county petitions that meet the following:
 - BMP's have been met by the city or county
- Ecology must also determine:
 - If costs are “extraordinary”
- Before January 1st of each year, Ecology will develop and submit a prioritized list of submitted petitions to the legislature.



Petition Elements

- Basic application (contacts etc.)
 - Documentation of costs
 - Narrative justification
 - Copy of operational manual – documenting BMPs
 - Potential inspection
 - Other supporting documents
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Open Discussion

- Questions?
- Other counties' experiences?
- Actions being taken by counties?
- Data – data- data

Stay tuned! Contact: Megan Warfield

360-407-6963

megan.warfield@ecy.wa.gov